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November 11, 1996

BY FAX AND FIRST CLASS MAIL

Mr. Kurt Lindland
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Dear Mr. Lindland:

**Re: Albion-Sheridan Township Landfill Site
Albion, Michigan**

Your letter of October 11 is acknowledged. I apologize for the delay in responding, but you requested information that was not readily available. As I promised in my telephone message on November 4, 1996, I'm enclosing a list of the various dates when particular events occurred, or when discussions were held with Cooper, Corning or the EPA.

I have not listed internal contacts nor efforts made with Decker's own consultants. Privileged or attorney work product was likewise omitted. It would be accurate to say that substantially more activity was involved than is reflected on the list. It is also possible that other contacts and efforts occurred with Cooper, Corning and the EPA, since the records I was working with are not necessarily complete.

The current status is that it appears the Project Coordinator is continuing to submit progress reports outlining what is being done, and we would refer you to those documents for further explanation. Decker determined, and we believe rightly so, that it made no sense to get another Project Coordinator involved and interfering with each another in the efforts to resolve the problem with the landfill. If you disagree with that point of view, please advise and we can commence independent action in the event the allocation issues are not worked out with Cooper and Corning.

Finally, this is to advise that we are meeting tomorrow, Tuesday, November 12, with Cooper and Corning to discuss possible

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resolution of the allocation issues. After that meeting has been completed, we can report further on what progress is made.

If you have any other questions, please advise.
Yours very truly,

**BULLEN, MOILANEN,
KLAASEN & SWAN, P.C.**

By


Philip M. Moilanen

skn

Enc.

cc: Decker Manufacturing Corp.

1/7/96

ALBION-SHERIDAN LANDFILL SITE - DECKER MANUFACTURING CORP
Cooper/Corning/EPA Contacts

| <u>Date</u> | <u>Contact</u> |
|-------------|--|
| 7/7/95 | Telephone conference - Ceil Price re EPA |
| 7/12/95 | Review new documents, participate in conference call |
| 7/26/95 | Conference call re EPA claim |
| 8/1/95 | Telephone conference with Attorney Mason of EPA |
| 9/22/95 | Review and revise affidavit and letter to EPA |
| 10/11/95 | Assemble material for EPA re Albion-Sheridan landfill and send out letter |
| 10/18/95 | Telephone conference - Ceil Price |
| 10/20/95 | Telephone conference to EPA officials |
| 10/31/95 | Telephone conference - Ceil Price |
| 11/6/95 | Attend EPA meeting; conference among PRPs |
| 11/9/95 | Telephone conference - Leah Evison |
| 12/6/95 | Telephone conference - Ceil Price |
| 12/12/95 | Telephone conference - EPA offices |
| 12/13/95 | Telephone conference - Leah Evison |
| 1/10/96 | Letter to Price re status of response to EPA |
| 1/10/96 | Letter to Thomas re status of response to EPA |
| 1/24/96 | Telephone conference - Kurt Lindland |
| 2/2/96 | Conference call with Cooper, Corning re PC selection; Decker offer to coordinate project efforts; discussion of committee to coordinate; Decker proposal that Cooper, Corning coordinate the project efforts; discussion of participation agreement terms. |
| 2/5/96 | Work on PC bidder interview criteria |
| 2/7/96 | Telephone conference Smith, Thomas, Price |
| 2/7/96 | Letter to Smith, Gray, Thomas, Price |

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| 2/8/96 | Telephone conference Smith, Gray re PC qualifications; review materials, dictation re P.C. selection |
| 2/8/96 | Letter to Smith, Gray, Thomas, Price re PC selection |
| 2/9/96 | Telephone conference Smith; prepare documents |
| 2/10/96 | Letter to Lindland |
| 2/12/96 | Attend interviews for selection of project coordinator; work on criteria for selection; dictate letters to bidders |
| 2/13/96 | Prepare, assemble and Fed Ex bid package information and letter to PC bidders. |
| 2/13/96 | Telephone conference Thomas & Price re agreements |
| 2/13/96 | Telephone to Lindland requesting materials |
| 2/15/96 | Letter to Gray re materials |
| 2/15/96 | Telephone conference Smith re materials |
| 2/19/96 | Review status and prepare summary |
| 2/20/96 | Research; review bids, study |
| 2/21/96 | Review bids |
| 2/22/96 | Telephone conference Smith re rescheduling 2/26 conference call to make PC selection to 2/27. |
| 2/25/96 | Review bids |
| 2/26/96 | Review Price letter 2/23/96 excluding Decker from selection of PC and all technical decisions. |
| 3/1/96 | Letter to Lindland |
| 3/1/96 | Letter to Price/Thomas |
| 3/5/96 | Review materials, study and prepare items for EPA discussions |
| 3/8/96 | Letter to Evison |
| 3/13/96 | Telephone conference - L. Evison re status |
| 4/22/96 | Telephone conference - Evison office |
| 5/1/96 | Study, telephone conference Lindland |

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| 5/8/96 | Letter to Lindland |
| 5/13/96 | Review letter from Lindland |
| 5/13/96 | Dictate draft of letter to Price/Thomas |
| 5/17/96 | Revise letter to Price, Thomas |
| 5/20/96 | Revise letter to EPA |
| 5/21/96 | Letter to Price, Thomas |
| 5/21/96 | Telephone conference re letter to EPA & Status |